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Columbia, SC 29201-1708

**MEMORANDUM**

**TO:** Shinisha Perry, Engineer  
Operations Engineering Section  
Division of Waste Management  
Bureau of Land and Waste Management

**FROM:** William A. (Scotty) McInnis, III, P.G., Hydrogeologist *JM*  
RCRA Groundwater Section  
Division of Waste Management  
Bureau of Land and Waste Management

**DATE:** June 22, 2010

**RE:** Ashland Inc.  
SCD 062 697 735  
Greenville County

*Comprehensive RFI Report, Received April 29, 2010*

The Division of Waste Management in the South Carolina Department of Health and Environmental Control (Division) has reviewed the referenced submittal. Based on influence of the Bi-Lo well on the groundwater plume, the Division recommends an assessment plan to install paired wells at two (2) locations between the Bi-Lo pond and Overcreek Road and Rockbridge Road. The depth of the deep wells should be at the same interval as the known contamination in the Bi-Lo well. The depth of the deep wells should be at the same interval as the known contamination in the Bi-Lo well.

HW100226.WAM  
Bureau File # 51607

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*Promoting and protecting the health of the public and the environment.*

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## MEMORANDUM

TO: Shinisha Perry, Engineering Associate  
Operations Engineering Section  
Division of Waste Management  
Bureau of Land and Waste Management

FROM: Kent Krieg, Risk Assessor  
Corrective Action Engineering Section  
Division of Waste Management  
Bureau of Land and Waste Management

DATE: May 24, 2010

RE: Former Ashland DSO  
Greenville, South Carolina  
SCD 062 697 735

Documents:  
Comprehensive RFI Report  
Former Ashland Distribution Services Organization  
Dated April 27, 2010

Soil Gas Sample Evaluation  
Former Ashland Distribution Services Organization  
Dated December 17, 2009

Site Progress Report - April 2008  
Soil Gas, Surface Water, and Sediment Investigations  
Former Ashland Distribution Services Organization  
Dated July 15, 2008

The above referenced documents by Arcadis have been reviewed. The Department has the following risk related comments:

### Specific Comments:

#### *Site Progress Report - April 2008*

1. Ecological Summary and Conclusions, page 19/21:

The Human Health Exposure Assessment adequately identifies the likely scenarios for human receptors under current and future conditions. The Department believes that further discussion of the ecological conceptual site model is necessary. Please expand on the selection for aquatic organisms in addition to rationale why terrestrial receptors were not addressed.

*Soil Gas Sample Evaluation*1. Toxicity Assessment, page 5/10:

Based on the lack of South Carolina DHEC risk assessment guidance and discussions with US EPA Region 4, it is concluded that bromodichloromethane should be treated as a Class B2 – probable human carcinogen and 1,1-dichloroethene should be treated as a Class C – possible human carcinogen. Due to these classifications, the Department does not concur with the current carcinogenic risk calculation and requests that the risk be recalculated to include bromodichloromethane and 1,1-dichloroethene. Although route-to-route extrapolation is no longer recommended by the US EPA, the Cal EPA inhalation unit risk factor, the class designations, as well as US EPA Region 4 practices suggest that the more conservative, cancer-based approach also is warranted. The Department would support additional text to be included in the uncertainty section to address the use of the Cal EPA value to be used in future risk management decisions.

2. Table 2 – Selection of Constituents of Potential Concern in September 2009 Soil Gas

The Department requests the MDL values for each contaminant be added to the table. There are multiple 'U flagged' values which show the constituents were not detected at the listed reporting limit but the reporting limit exceeded the screening values. The Department is also interested why both the worst-case and residential values were included for SCDHEC Active Soil Gas screening level references.

If you need any further information, feel free to contact me at (803) 896-4262.